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July 14, 2020

By ECF

Hon. Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: Convergen Energy LLC, et al. v. Brooks, et al.
Case No. 1:20-CV-03746-LJL

Dear Judge Liman:

The parties have conferred with each other by electronic mail and have agreed that, in order to protect the confidentiality of certain non-public and confidential material that will be exchanged during the course of discovery in this case, it is important to have a protective order entered in the above-referenced matter. The parties have further agreed that certain documents and information to be produced may require a higher level of protection beyond that afforded in the Court's standard form. As such, the parties ask the Court to enter the revised proposed order, filed herewith. For the Court's convenience, we have also included a redline version of the order as an exhibit.

We are authorized to state that attorneys Dov B. Gold and Ryan M. Billings have reviewed and approve this letter.

Very truly yours,

von BRIESEN & ROPER, s.c.

A handwritten signature in black ink, appearing to read "W.E. Fischer". It is enclosed in a stylized oval border.

William E. Fischer

WEF:erk

cc: Counsel of Record via ECF